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March 10, 2022

Via ECF

Honorable Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street, Room 2230 New York, New York 10007

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Re: Computer Sciences Corporation v. Endurance Risk Solutions Assurance Co. et al., Case No. 1:20-cv-01580 (MKV) S.D.N.Y.

Dear Judge Vyskocil:

This firm represents Endurance Risk Solutions Assurance Co. ("Endurance" or "Defendant") in the above-referenced case. We are writing pursuant to Section 9.B. of Your Honor's Individual Practice Rules to respectfully request leave to file our Reply Memorandum of Law in Further Support of Endurance's Motion to Enforce the Settlement Agreement between Computer Sciences Corporation ("CSC" or "Plaintiff") and Endurance as partially redacted.

Pursuant to Your Honor's Rules, to be approved, any redaction or sealing of a court filing must be narrowly tailored to serve whatever purpose justifies the redaction or sealing and must be otherwise consistent with the presumption in favor of the public access to judicial documents. *See*, *e.g.*, *Lugosch* v. *Pyramid Co. of Onondaga*, 435 F. Ed 110, 119-20 (2d Cir. 2006). On February 3, 2022, Your Honor granted our request to file our memorandum of law and affidavit for the Motion to Enforce the Settlement Agreement as partially redacted, as well our request to file the exhibits under seal. Endurance seeks permission to file a redacted version of its Reply Memorandum of Law for the Motion to Enforce the Settlement Agreement for the same reasons related to confidential settlement discussions and to avoid any potential conflict with Rule 408 of the Federal Rules of Evidence.

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Respectfully submitted,

Erica J. Kerstein

cc: All Counsel of Record

Granted. SO ORDERED.

Date: 3/10/2022 New York, New York

Mary Kay Wskocil
Inited States District Judge